REMARKS

This paper is intended to be a complete response to the above-identified Office Action. It is believed no fee is due. If fees are required, however, the Commissioner is authorized to deduct the necessary charges from Deposit Account 501922/119-0020US.

Claim 1 has been amended. No claims have been cancelled or added by this Reply. Accordingly, claims 1-76 are currently pending in the instant patent application.

Section 101 Rejections

The Examiner has rejected claim 1 as allegedly being directed to unpatentable subject matter under 35 U.S.C. 101. Independent claim 1 has been amended to recite that the act of "displaying a superset of the file objects associated with each of the designated file system locations in a single display" is provided via a hardware "display unit" (*e.g.*, of the type recited in independent claim 40). This amendment is believed to address the Examiner's concern. Accordingly, Applicant respectfully requests this rejection be withdrawn.

Section 102 Rejections

The Examiner has rejected claims 1-9, 11, 12, 14-17, 25-31, 33, 35, 36, 40-46, 49-55 and 61-69 as allegedly being anticipated under 35 U.S.C. 102(e) by U.S. Patent Publication 2003/0163519 to Kegel et al. ("Kegel"). Office Action at pages 4-10, ¶¶ 6-25. Specifically, the Examiner asserts that (Office Action at pages 4-5, ¶ 8):

> 8.   Regarding Claims 1, 25, 40, 49, and 65, Kegel teaches changing hypermedia content of a web site.
>
> The method and associated system for changing hypermedia content of a web site as taught or suggested by Kegel includes:
>
> designating a plurality of file system locations (¶0052, "...a hierarchical folder and file structure for PC 1a is shown in FIG. 3. At the top of the hierarchical structure is a folder 20 labeled "Desktop."; ¶0053, "The folder 23 comprises files held on a floppy disk

when inserted into the floppy disk drive 7a of FIG.1. Folder 24 is a repository for files

held on the hard disk 7b shown in FIG. 1 and folder 25 is a repository for files available

through the CD/DVD ROM drive 7c of FIG. 1."; ¶0061, "The hierarchical folder structure

for the "Lemon Catering"..."), wherein each file system location is associated with zero

or more file objects (¶0052, "At the top of the hierarchical structure is a folder 20 labeled

"Desktop". This provides an overview of the files that are accessible by the PC 1a.

Beneath the top of the hierarchical structure is a lower level of folders or subfolders,

shown to the right of folder 10, comprising folders 21 and 22.", ¶0053-0054); displaying

a superset of the file objects associated with each of the designated file system

locations in a single display (¶0061, "...a root folder 33 named "Lemon Source" with the

following sub-folders on the next lower level of the hierarchy "About Us"34,

"Contacts"35, Products"36 and "Services"37. For the next lower level of the hierarchy,

the folder "Products"36 has associated sub-folders "Meals"38 and "Snacks"39. For the

next lower level of the hierarchy, the folder "Meals"38 has associated sub-folders

"Breakfast"40, "Evening Meal"41 and "Lunch"42."); a central processing unit (figure 1,

element PC 1a); memory (figure 1, elements 9 or 10) operatively coupled to the central

processing unit; a computer network (figure 1, element 11) coupled to the central

processing unit; a display unit (figure 1 element 4); a storage device (figure 1, element

1a); and display on the display unit (¶0057-0061, figure 2, element 16), a file-browser

application (figure 2, element 18, ¶0051).

1.   US Patent Publication 2003/0163519 to Kegel

Kegel discloses method for "changing [the] hypermedia content of a web site."
Kegel at [0001]. In accordance with Kegel, "[p]ages of a web site can be
selectively altered or added by remote users, by e-mailing
updates to a computer configuration that supports the
site." Kegel at Abstract. It appears Kegel describes a way
to convert a user-generated hierarchical file structure
into hypermedia for a web site with hyperlinks

corresponding to the file structure. Kegel at [0057], Figs. 1-4.

2.   Discussion

Kegel at [0051] – [0061] and FIGS. 1-3 appears to describe a standard hierarchical file structure of the type noted by Applicant. See Specification at [0004] (Fig. 1) and [0021] (Fig. 3A). In contrast to the claimed invention, file view operations in accordance with Kegel uses "the Windows Explorer viewer 17 [that] includes a left hand window 30 that shows the hierarchical folder structure, and a right hand window 31 that shows the *individual files* included within a particular folder. In the usual way, the files within a particular folder are revealed by clicking on the folder concerned in the left hand window 30 with the mouse, so as to open the folder such that its *files are displayed individually in the right hand window 31.*" Kegel at [0061] and FIG. 5 (emphasis added). Viewing the contents of a single directory at a time is the very antithesis of the claimed invention – displaying a superset or set union of the file objects associated with each of two or more designated file system locations in a single display. See independent claims 1, 25, 40, 49 and 65.

Kegel further distinguishes his system from the claimed invention when describing the illustrative "Lemon Catering" web site. Kegel at [0061]-[0081] and FIGS. 5-7. Specifically, Kegel notes that each folder/directory in the hierarchical file structure of FIG. 5, constitutes a node in the web site. Kegel at [0061]-[0062]. Hyperlinks within each web page allows a user to "jump" from the information in one directory to the information of another directory. Kegel at [0065]-[0069] and FIG. 5. There is no mention or suggestion that the contents of multiple directories are displayed simultaneously.

At no time, and in no way, does Kegel teach or fairly describe displaying a superset or set union of the file objects associated with each of two or more designated file system locations in a single display. For at least this reason alone, Kegel fails to teach each element recited in independent claims 1, 25, 40, 49 and 65. As a result, the Examiner has failed to present a legitimate *prima facie* anticipatory rejection under 35

U.S.C. 102. As such, Applicant respectfully requests that the Examiner withdraw these rejections. Further, each of rejected claims 2-9, 11, 12, 14-17, 26-31, 33, 35, 36, 41-46, 50-55, 61-64 and 66-69 depends from one of independent claims 1, 25, 40, 49 and 65. Since each independent claim is patentable over Kegel as discussed above, each of the identified dependent claims are also allowable. Accordingly, Applicant respectfully requests that the Examiner withdraw these rejections.

Section 103 Rejections

The Examiner has rejected claims 10, 13, 18-24, 32, 34, 37-39, 47, 48, 56-60 and 70-74 as allegedly being unpatentable under 35 U.S.C. 103(a) over Kegel as applied to claim 1 above, and further in view of U.S. Patent Publication 2003/0084096 to Starbuck et al. ("Starbuck").

Each of the rejected claims depend from one of independent claims 1, 25, 40, 49 and 65. Because each of independent claims 1, 25, 40, 49 and 65 is patentable over the cited art (see discussion above), each of dependent claims 10, 13, 18-24, 32, 34, 37-39, 47, 48, 56-60 and 70-74 is also allowable. Accordingly, it is respectfully requested that the Examiner withdraw these rejections.

CONCLUSIONS

Reconsideration of pending claims 1-76 in light of the above remarks and amendments is respectfully requested. If, after considering this reply, the Examiner believes that a telephone conference would be beneficial towards advancing this case to allowance, the Examiner is strongly encouraged to contact the undersigned attorney at the number listed.

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